

## REMARKS

Applicants respectfully submit this Amendment and Response in reply to the Official Action dated June 8, 2010. Applicants respectfully submit that the Amendment and Response is fully responsive to the Official Action for at least the reasons set forth herein.

At the onset, Applicants have amended claims 9, 10 and 12. Specifically, claims 9, 10, and 12 have been amended to recite, *inter alia*, said business procedure being adaptable by changing said 5W1H-format elemental information without changing definitions for each of a 5W1H-format category and a relationship between.

Claim 11 has been cancelled herewith without prejudice to the subject matter of the claim being reintroduced into this application or introduced in a later filed related application.

No new matter has been added to the application by way of the aforementioned amendments. For example, Applicants respectfully direct the Examiner's attention to pages 6 and 7. However, Applicants note that the identified section is presented only for the convenience of the Examiner by way of example and is not intended to be an exhaustive list.

Claim 10 was rejected under 35 U.S.C. § 101 as allegedly being directed to non-statutory subject matter. Applicants believe that the rejection contains a typographical error as it appears that the Examiner meant claim 11. Accordingly, Applicants assume that the rejection was against claim 11 (not claim 10). Applicants respectfully request withdrawal of the rejection. Without acquiescing to the propriety of the rejection, Applicants note that the rejection is moot since claim 11 has been cancelled.

Claims 9-12 were rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Wilson et al., U.S. Pat. Pub. 2002/0133387 (hereinafter "Wilson") in view of Huang et al., U.S. Patent No. 6,151,582 (hereinafter "Huang").

Applicants submit that claims 9, 10 and 12 are patentable over the cited references based at least upon the following analysis. Even if a person of ordinary skill in the art would combine

the teachings from Wilson and Huang and the combination was proper, a person of ordinary skill in the art would still not achieve that claimed invention. For example, Applicants submit that the cited combination fails to teach or render obvious the limitations of at least one outside system interface providing the corresponding supply information, wherein each at least one outside system interface is selected from product design information management, computer aided design, computer aided testing, computer aided manufacturing and automated machinery; and at least one business procedure comprising a plurality of sets of information, and said business procedure being adaptable by changing said 5W1H-format elemental information without changing definitions for each of a 5W1H-format category and a relationship between, as recited in claim 12 (and similarly recited in claims 9 and 10).

Admittedly, the Examiner agrees that Wilson fails to teach at least one outside system interface providing the corresponding supply information; however, the Examiner asserts that Huang teaches this feature. Applicants respectfully disagree.

Notably, the Examiner cites Col. 16, lines 38-70 as support for his assertion. Applicants submit that the identified section fails to suggest the claimed feature. The identified section teaches a system that estimates future repair requirements generated by equipment failure. This information is used in the requirements-supply reconciliation planning process. The Examiner appears to equate “raw requirements” to product design information and accordingly, appears to contend that the requirements management system is the claimed product design information management. Applicants respectfully disagree. Huang explicitly states that the raw requirements correspond to all repair requirements of the equipment. There is no teaching that the raw requirements are equivalent to product *design* information and therefore, the reference does not teach the claimed selection, i.e., each at least one outside system interface is selected from product design information management, computer aided design, computer aided testing, computer aided manufacturing and automated machinery. The remaining part of the identified section describes the estimation process.

Furthermore, the “raw requirement” is not the claimed corresponding supply information, which corresponds to the demand information. The reference fails to teach that claimed relationship, link or correspondence.

Additionally, it is not clear what the Official Action considers “the outside system interface” or even where the system begins and ends as a reference point for “outside the system”. The Official Action simply identifies the requirement management system. However, a person of ordinary skill in the art could interpret Huang to teach that the requirement management system is internal to an information processing system.

Moreover, the references, whether taken alone or in any combination thereof, fail to teach or suggest the limitation of said business procedure being adaptable by changing said 5W1H-format elemental information *without* changing a definition for a 5W1H-format and a relationship between.

Tellingly, Huang discloses a supply chain procedure which is coded in procedure-type language, so that a change in the supply chain procedure *necessitates a change in software modules, along with a change in the interaction between modules* and perhaps data structures. In stark contrast, in the claimed invention, the business procedures are changed merely by changing the underlying data such as the data entries in the five W's and one H, that is, 5W1H-format elemental information comprising Who, to Whom, What, by When, Where, and How much. The definitions, modules and interaction thereof are not changed.

As such, among other advantages, the claimed system and method is capable of quickly accommodating business process reengineering and changes proposed by quality control activities. Applicants' solution includes creating sets of information and establishing not only a collection of generation sequences for these sets of information but also a process or flow for the collection of sequences. Thus, changes necessitated by business process redesign can be quickly performed. Using Applicants' invention, it is possible to change an entire multi-step business process as well as an underlying business procedure by making a change in the data in cells of a master table. Of particular note, Wilson does not even teach a multi-step business process, but

rather describes only the delivery step. Wilson assumes that the product is designed, assembled, tested, and inspected. Wilson is directed to managing inventory from multiple warehouses.

Furthermore, while Wilson teaches multiple delivery options and scenarios, Wilson also does not teach that the business procedure is adaptable by changing the 5W1H-format elemental information without changing a definition for a 5W1H-format and a relationship between. In fact, Wilson does not teach maintaining a database in a 5W1H-format having a relationship between.

Applicants further submit that the Official Action does not recite all of the required factual findings for the selected rationale for combining the references. At best, the Official Action merely states conclusions. Notably, the Official Action contains barebones conclusion “that it would be obvious to one skilled in the art at the time of the invention to combine the references as the instant invention is (1) **simply** a combination of two **known** processes that when combined (2) would have **performed the same** as they did separately therefore (3) **yielding predictable** results with (4) a **reasonable expectation of success.**” (emphasis added)

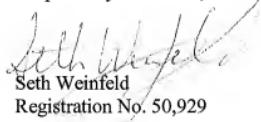
Factual support for each of these four distinct requirements should be explicitly stated in the rejection. The system disclosed in Huang is far from simple as the description includes 63 figures and 144 columns and a combination of the two would not be simple. Further, the Official Action does not provide any factual reasons why the combined system(s) would perform the same as they did separately.

Accordingly, Applicants submit that claims 9, 10 and 12 are patentable over the cited references. Therefore, Applicants respectfully request withdrawal of the rejection of claims 9, 10 and 12 pursuant to 35 U.S.C. § 103(a) as the claims are not obvious in view of the cited references.

Based upon the foregoing, Applicants respectfully submit that the application is in condition for allowance and henceforth solicit a Notice of Allowability. Should the Examiner

believe that a telephone interview would expedite allowance of the application; the Examiner is kindly requested to contact the undersigned.

Respectfully submitted,



Seth Weinfeld  
Registration No. 50,929

Scully, Scott, Murphy & Presser, P.C.  
400 Garden City Plaza, Suite 300  
Garden City, New York 11530  
(516) 742-4343  
SMW:ae